

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 3283

17102715248



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 28, 2017

MEMORANDUM

SENSITIVE

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

FROM: Patricia C. Orrock *DC / PCO*
Chief Compliance Officer

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

BY: Kristin D. Roser/Ben Holly *BH*
Reports Analysis Division *ll for KDR*
Compliance Branch

SUBJECT: Reason To Believe Recommendation - 2016 30 Day Post-General Report
(Unauthorized Filers) for the Administrative Fine Program

2017 MAR 28 PM 10:19

Attached is a list of political committees and their treasurers who failed to file or timely file the 2016 30 Day Post-General Report in accordance with 52 U.S.C. § 30104(a). The list is comprised of unauthorized committees that failed to file or timely file the 2016 30 Day Post-General Report.

The committees appearing on the 30 Day Post-General Report list either failed to file the report, filed the report : within thirty (30) days of the due date (considered a late filed report), or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with 11 C.F.R. § 111.43, these committees should be assessed the civil money penalties indicated in the attachment.

In order to determine the level of activity for unauthorized quarterly filers that failed to file or failed to timely file the 30 Day Post-General Report, the Reports Analysis Division (RAD) used the following procedures and criteria:

- Every 30 Day Post-General Report (30 Day Report) submitted by an unauthorized quarterly filer that covered the period from October 1, 2016 through November 28, 2016 (59 days),

was reviewed for activity which would have required the filing of a 12 Day Pre-General Report (12 Day Report). If our research indicated that the filing of a 12 Day Report was required, we utilized a two-step method to arrive at the estimated level of activity on which to base the fine amount. First, we took the sum of all itemized receipts and disbursements that should have been disclosed on a 12G. Second, if the committee had any unitemized activity, a per diem level of activity was used by multiplying the total amount of activity on the report by 32.2% (19 days (12G Filing Period)/59 days (30G Filing Period)).

- The committees identified through this process as failing to file or failing to timely file the 12 Day Report were included in the Reason to Believe Recommendation circulated to the Commission on March 20, 2017. If the same committee also failed to file the 30 Day Report in a timely manner, we based the 30 Day Report fine on the amount of the remaining level of activity. We arrived at this amount by subtracting the estimated level of activity for the 12 Day Report from the total amount of activity on the 30 Day Report. In these cases, the committees will also be assessed a fine for the 30 Day Report based on the estimated levels of activity described above and are included on the attached list.

Recommendation

1. Find reason to believe that the political committees and their treasurers, in their official capacity, listed on the RTB Circulation Report violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.
2. Send the appropriate letters.

Federal Election Commission
Reason to Believe Circulation Report
2016 POST-GENERAL Not Election Sensitive 12/08/2016 UNAUTH

| AF# | Committee ID | Committee Name | Candidate Name | Treasurer | Threshold | PV | Receipt Date | Days Late | LOA | RTB Penalty |
|------|--------------|--|------------------|--------------------|---------------|----|--------------|-----------|--------------------|-------------|
| 3253 | C00623256 | AMERICA COMES FIRST PAC | | DAVID W. SCHAMENS | \$463,211 | 0 | 12/14/2016 | 6 | \$5,491 | \$101 |
| 3254 | C00461624 | ARTICLE 1 POLITICAL ACTION COMMITTEE | | RICK GALENA | \$182,587 | 0 | 12/29/2016 | 21 | \$27,300 | \$823 |
| 3255 | C00559146 | BELIEVE IN LIFE LIBERTY YOURSELF (BILLY PAC) | | JERED TAYLOR | \$206,543 | 0 | 1/26/2017 | Not Filed | \$9,042 | \$392 |
| 3256 | C00531285 | BRADY VICTORY FUND | KEVIN BRADY | MICHAEL J. KARLINS | \$2,174,702 | 0 | 12/14/2016 | 6 | \$150,642 | \$2,360 |
| 3257 | C00496927 | CITIZENS SUPER PAC FOR AMERICA (CSPAC) | | SIDDIQ MUMIN | \$232,710 | 1 | | Not Filed | \$46,542 (est) | \$1,470 |
| 3258 | C00109595 | COMMUNICATION WORKERS OF AMERICA LOCAL 13000 | | MARISA MACCRORY | \$460,660 | 0 | 1/5/2017 | 28 | \$23,264 | \$307 |
| 3259 | C00388181 | CONNELL FOLEY PAC A NEW JERSEY NON-PROFIT CORPORATION | | JOHN P. LACEY | \$123,191 | 0 | 1/31/2017 | Not Filed | \$2,500 | \$326 |
| 3260 | C00191288 | DC REPUBLICAN PARTY FEDERAL ACCOUNT | | RODERICK JOHNSON | \$158,584 | 0 | 1/17/2017 | Not Filed | \$870 | \$326 |
| 3261 | C00146605 | FARMERS' RICE COOPERATIVE FUND | | BILL TANIMOTO | \$156,561 | 0 | 12/16/2016 | 8 | \$8,200 | \$113 |
| 3262 | C00605634 | FLORIDIANS FOR A GOOD ECONOMY | | ERIC W. ROBINSON | \$125,454 | 0 | 1/30/2017 | Not Filed | \$2,380 | \$326 |
| 3263 | C00404350 | FRESNO COUNTY DEMOCRATIC WOMEN'S CLUB/DEMOCRATS IN ACTION | | SHARLYN WOODY | \$147,245 | 0 | | Not Filed | \$24,625 (est) | \$654 |
| 3264 | C00385740 | FROZEN FOOD POLITICAL ACTION COMMITTEE | | ALISON REICH BODOR | \$149,916 | 0 | | Not Filed | \$29,983 (est) | \$1,176 |
| 3265 | C00616078 | GET OUR JOBS BACK, INC | | STEVEN HOFFENBERG | \$100,648,528 | 0 | | Not Filed | \$50,324,263 (est) | \$16,671 |
| 3266 | C00297531 | GOVERNMENT IS NOT GOD | | NANCY MURRAY | \$124,190 | 0 | 12/19/2016 | 11 | \$5,672 | \$131 |
| 3267 | C00524363 | GREAT LAKES SUPER POLITICAL ACTION COMMITTEE | | DWIGHT WASHINGTON | \$157,500 | 0 | | Not Filed | \$31,500 (est) | \$1,176 |
| 3268 | C00609859 | ILLINOIS FAMILIES FIRST | | D. PAUL CAPRIO | \$156,475 | 0 | 1/31/2017 | Not Filed | \$300 | \$300 |
| 3270 | C00291799 | MASON CONTRACTORS ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE-MACPAC | | JEFF BUCZKIEWICZ | \$101,203 | 0 | 1/4/2017 | 27 | \$1,000 | \$195 |
| 3271 | C00577148 | MCCASKILL SENATE FUND | CLAIRE MCCASKILL | MICHELLE SHEROD | \$456,913 | 0 | 1/5/2017 | 28 | \$1,132 | \$201 |

| AF# | Committee ID | Committee Name | Candidate Name | Treasurer | Threshold | PV | Receipt Date | Days Late | LOA | RTB Penalty |
|------|--------------|---|----------------|---------------------|-------------|----|--------------|-----------|----------------|-------------|
| 3272 | C00343590 | MECHANICAL CONTRACTORS ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE (MCA-PAC) MICHIGAN DOCTORS | | JOHN P. MCNERNEY | \$338,498 | 1 | 1/5/2017 | 28 | \$6,100 | \$291 |
| 3273 | C00001180 | POLITICAL ACTION COMMITTEE - MICHIGAN STATE MEDICAL SOCIETY | | SCOT F. GOLDBERG | \$166,784 | 0 | 1/28/2017 | Not Filed | \$8,702 (est) | \$392 |
| 3274 | C00571950 | MILLENNIALS RISING PAC | | MICHELLE GOODWIN | \$107,521 | 0 | 1/20/2017 | Not Filed | \$185 | \$185 |
| 3275 | C00528026 | NATIONAL CANNABIS INDUSTRY ASSOCIATION PAC | | MICHAEL J. CORREIA | \$143,866 | 0 | 2/16/2017 | Not Filed | \$24,000 | \$654 |
| 3276 | C00111278 | NATIONAL RIGHT TO LIFE POLITICAL ACTION COMMITTEE | | WAYNE COCKFIELD | \$1,231,617 | 0 | 12/16/2016 | 8 | \$355,478 | \$4,995 |
| 3277 | C00509893 | NATIONAL RIGHT TO LIFE VICTORY FUND | | WAYNE COCKFIELD | \$2,419,656 | 0 | 12/20/2016 | 12 | \$512,611 | \$6,797 |
| 3278 | C00427203 | PENINSULA DEMOCRATIC COALITION | | ZACHERY ROSS | \$462,578 | 0 | 1/13/2017 | Not Filed | \$2,019 | \$326 |
| 3279 | C00103937 | PHYLLIS SCHLAFLY EAGLE FORUM PAC | | JOHN SCHLAFLY | \$417,239 | 0 | 1/25/2017 | Not Filed | \$2,197 | \$326 |
| 3280 | C00626697 | RIGHTS & DEMOCRACY PROJECT | | TRAVERN LEYSHON | \$109,264 | 0 | 2/22/2017 | Not Filed | \$97,032 | \$4,862 |
| 3281 | C00574806 | RUN RAY RUN | | GIANNI DONATES | \$312,767 | 0 | 1/15/2017 | Not Filed | \$42,836 (est) | \$1,176 |
| 3282 | C00586180 | RUSS VICTORY FUND | | JOHN W. MILLER | \$4,097,870 | 0 | 1/4/2017 | 27 | \$1,491,744 | \$14,425 |
| 3283 | C00362632 | SWING STATES FOR A CONSERVATIVE WHITE HOUSE PAC INC | | OFFICE OF TREASURER | \$134,449 | 0 | | Not Filed | \$44,816 (est) | \$1,176 |
| 3284 | C00612846 | THE DEMOCRATIC COALITION | | FRANCESCA N. LUCIA | \$247,741 | 0 | 1/18/2017 | Not Filed | \$22,676 | \$654 |
| 3285 | C00454140 | TURKISH AMERICAN HERITAGE POLITICAL ACTION COMMITTEE - TURKISHPAC | | TEKIN KUNT | \$130,568 | 0 | 12/20/2016 | 12 | \$16,910 | \$211 |

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) AF 3283
Reason To Believe Recommendation -)
2016 30 Day Post-General Report)
(Unauthorized Filers) for the)
Administrative Fine Program: Swing)
States for A Conservative White House)
PAC, Inc. and Office of Treasurer)

CERTIFICATION

I, Dayna C. Brown, Secretary and Clerk of the Federal Election
Commission, do hereby certify that on March 29, 2017, the Commission
decided by a vote of 5-0 to take the following actions in AF 3283:

1. Find reason to believe that Swing States for A Conservative White House PAC, Inc. and Office of Treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be \$1,176.
2. Send the appropriate letter.

Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

March 30, 2017
Date

Dayna C. Brown
Dayna C. Brown
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 31, 2017

Office of Treasurer, in official capacity as Treasurer
Swing States for A Conservative White House PAC, Inc.
717 Whitehills Drive
East Lansing, MI 48823

C00362632
AF#: 3283

Dear Office of Treasurer:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a 30 Day Post-General Report of Receipts and Disbursements in a calendar year in which a regularly scheduled general election is held. This report, covering the period October 1, 2016 through November 28, 2016 shall be filed no later than December 8, 2016. 52 U.S.C. § 30104(a). Because records at the Federal Election Commission ("FEC") indicate that you did not file this report within thirty (30) days of the due date, the report is considered not filed for the purpose of calculating the civil money penalty. You should file the report if you have not already done so.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109(a)(4). On March 29, 2017, the FEC found that there is reason to believe ("RTB") that Swing States for A Conservative White House PAC, Inc. and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file timely this report on or before December 8, 2016. Based on the FEC's schedules of civil money penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$1,176. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <http://www.fec.gov/af/af.shtml>. 11 CFR § 111.34. Your payment of \$1,176 is due within forty (40) days of the finding, or by May 8, 2017, and is based on these factors:

Sensitivity of Report: Not Election Sensitive
Level of Activity: \$44,816
Number of Days Late: Not Filed
Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response to the FEC's Office of Administrative Review, 999 E Street, NW, Washington, DC 20463. Your response must include the AF# (found at the top of page 1 under your committee's identification number) and be received within forty (40) days of the Commission's RTB finding, or May 8, 2017. 11 CFR § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 CFR § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 CFR § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 CFR § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 CFR § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. District Court under 52 U.S.C. § 30109. 11 CFR § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Swing States for A Conservative White House PAC, Inc. and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 *et seq.* The FEC may take any and all appropriate

action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

3. If You Choose to Pay the Civil Money Penalty

If you should decide to pay the calculated civil money penalty, follow the payment instructions on page 4 of this letter. Upon receipt of your payment, the FEC will send you a final determination letter.

NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS

4. Partial Payments

If you make a payment in an amount less than the calculated civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assesses upon making a final determination.

5. Settlement Offers

Any offer to settle or compromise a debt owed to the Commission, including making a payment in an amount less than the calculated civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assesses upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 52 U.S.C. § 30109(a)(2). Unless you notify the FEC in writing that you wish the matter to be made public, it will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and 30109(a)(12)(A) until it is placed on the public record at the conclusion of this matter in accordance with 11 CFR § 111.42.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Aimee Wechsler in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,



Steven T. Walther
Chair

ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at RTB is \$1,176 for the 2016 Post-General Report.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit www.fec.gov/af/pay.shtml to be directed to Pay.gov's Administrative Fine Program Payment form.

This penalty may also be paid by check or money order, made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission
P.O. Box 979058
St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please send to:

U.S. Bank - Government Lockbox
FEC #979058
1005 Convention Plaza
Attn: Government Lockbox, SL-MO-C2GL
St. Louis, MO 63101

PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: Swing States for A Conservative White House PAC, Inc.

FEC ID#: C00362632

AF#: 3283

PAYMENT DUE DATE: May 8, 2017

PAYMENT AMOUNT DUE: \$1,176



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

July 3, 2017

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer *AP* for AP
Staff Director

FROM: Patricia C. Orrock *DC* for PCO
Chief Compliance Officer

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

BY: *KR*
Kristin D. Roser/Ben Holly
Reports Analysis Division
Compliance Branch

SUBJECT: Final Determination Recommendation -
2016 30 Day Post-General Report (Unauthorized Committees) for the
Administrative Fine Program

2017 JUL -3 AM 11:54

Attached are two lists of political committees and their treasurers against which the Commission has found reason to believe (RTB) and assessed proposed civil money penalties calculated at RTB for failure to file or failure to timely file the 2016 30 Day Post-General Report. The first list represents the committees that have paid the civil money penalty and the second list represents the committees that have not paid the civil money penalty. The committees that have not paid have been given at least forty (40) days from the date of the Commission's RTB finding to remit payment.

In accordance with 11 CFR § 111.34 and 11 CFR § 111.40, the Commission shall send a final determination notice to those respondents that have either paid or not paid the civil money penalty.

For your information, four (4) committees disclosed a level of activity after the RTB finding, which would result in a lowered civil money penalty. An overview of these cases has been provided below.

Citizens SuperPAC for America (CSPAC) (AF 3257) disclosed no activity after the RTB finding (previously estimated to be \$46,542), which would result in no civil money penalty (fine previously assessed to be \$1,470).

Frozen Food Political Action Committee (AF 3264) filed the 2016 30 Day Post-General Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$110 (previously estimated to be \$29,983), thus the fine would be lowered from \$1,176 to \$110. The committee paid the civil money penalty assessed at RTB; we will therefore issue a refund for the difference (\$1,066).

Get Our Jobs Back, Inc. (AF 3265) disclosed no activity after the RTB finding (previously estimated to be \$50,324,263), which would result in no civil money penalty (fine previously assessed to be \$16,671).

Great Lakes Super Political Action Committee (AF 3267) disclosed no activity after the RTB finding (previously estimated to be \$31,500), which would result in no civil money penalty (fine previously assessed to be \$1,176).

For your information, two (2) committees disclosed a change in treasurer after the RTB finding. An overview of these cases is provided below.

Frozen Food Political Action Committee (AF 3264) filed an Amended Statement of Organization after the RTB finding designating Brandon Partridge as Treasurer.

Rights & Democracy Project (AF 3280) filed an Amended Statement of Organization after the RTB finding designating Maria Fitzsimmons as Treasurer.

RAD Recommendation

- (1) Make a final determination that the political committees and their treasurers, in their official capacity, listed on the attached reports violated 52 U.S.C. § 30104(a) and assess the final civil money penalties so indicated.
- (2) Make a final determination that the political committees and their treasurers, in their official capacity, listed on the attached reports with no activity, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty.
- (3) Send the appropriate letters.

Federal Election Commission
FD Circulation Report Fine Paid
2016 POST-GENERAL Not Election Sensitive 12/08/2016 UNAUTH

| AF# | Committee Name | Candidate Name | Committee ID | Treasurer | Receipt Date | Days Late | LOA | PV | RTB Date | RTB Penalty | Final Money Penalty | Date Paid | Amount Paid |
|------|--|------------------|--------------|----------------------|--------------|-----------|----------------|----|------------|-------------|---------------------|------------|-------------|
| 3254 | ARTICLE 1 POLITICAL ACTION COMMITTEE | | C00461824 | RICK GALENA | 12/29/2016 | 21 | \$27,300 | 0 | 03/29/2017 | \$823 | \$823 | 05/09/2017 | \$823 |
| 3255 | BELIEVE IN LIFE LIBERTY YOURSELF (BILLY PAC) | | C00559146 | JERED TAYLOR | 01/26/2017 | Not Filed | \$9,042 | 0 | 03/29/2017 | \$392 | \$392 | 05/02/2017 | \$392 |
| 3256 | BRADY VICTORY FUND | KEVIN BRADY | C00531285 | MICHAEL J. KARLINS | 12/14/2016 | 6 | \$150,842 | 0 | 03/29/2017 | \$2,360 | \$2,360 | 04/26/2017 | \$2,360 |
| 3258 | COMMUNICATION WORKERS OF AMERICA LOCAL 13000 | | C00109595 | MARISA MACCROORY | 1/5/2017 | 28 | \$23,284 | 0 | 03/29/2017 | \$307 | \$307 | 04/20/2017 | \$307 |
| 3259 | CONNELL FOLEY PAC A NEW JERSEY NON-PROFIT CORPORATION | | C00388181 | JOHN P. LACEY | 1/31/2017 | Not Filed | \$2,500 | 0 | 03/29/2017 | \$326 | \$326 | 04/18/2017 | \$326 |
| 3260 | DC REPUBLICAN PARTY FEDERAL ACCOUNT | | C00191288 | RODERICK JOHNSON | 1/17/2017 | Not Filed | \$870 | 0 | 03/29/2017 | \$326 | \$326 | 05/09/2017 | \$326 |
| 3261 | FARMERS' RICE COOPERATIVE FUND | | C00146805 | BILL TANIMOTO | 12/16/2016 | 8 | \$8,200 | 0 | 03/29/2017 | \$113 | \$113 | 05/02/2017 | \$113 |
| 3264 | FROZEN FOOD POLITICAL ACTION COMMITTEE | | C00385740 | BRANDON PARTRIDGE | 5/8/2017 | Not Filed | \$110 | 0 | 03/29/2017 | \$1,176 | \$1,176 | 5/2/2017 | \$1,176* |
| 3266 | GOVERNMENT IS NOT GOD | | C00297531 | NANCY MURRAY | 12/19/2016 | 11 | \$5,872 | 0 | 03/29/2017 | \$131 | \$131 | 04/13/2017 | \$131 |
| 3268 | ILLINOIS FAMILIES FIRST | | C00809859 | D. PAUL CAPRIO | 1/31/2017 | Not Filed | \$300 | 0 | 03/29/2017 | \$300 | \$300 | 04/11/2017 | \$300 |
| 3270 | MASON CONTRACTORS ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE-MACPAC | | C00281799 | JEFF BUCZKIEWICZ | 1/4/2017 | 27 | \$1,000 | 0 | 03/29/2017 | \$195 | \$195 | 04/12/2017 | \$195 |
| 3271 | MCCASKILL SENATE FUND | CLAIRE MCCASKILL | C00577148 | MICHELLE SHEROD | 1/5/2017 | 28 | \$1,132 | 0 | 03/29/2017 | \$201 | \$201 | 04/18/2017 | \$201 |
| 3272 | MECHANICAL CONTRACTORS ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE (MCA-PAC) | | C00343590 | JOHN P. MCNERNEY | 1/5/2017 | 28 | \$8,100 | 1 | 03/29/2017 | \$291 | \$291 | 05/02/2017 | \$291 |
| 3273 | MICHIGAN DOCTORS POLITICAL ACTION COMMITTEE - MICHIGAN STATE MEDICAL SOCIETY | | C00001180 | SCOT F. GOLDBERG, MD | 1/29/2017 | Not Filed | \$8,702 (est) | 0 | 03/29/2017 | \$392 | \$392 | 05/09/2017 | \$392 |
| 3274 | MILLENNIALS RISING PAC | | C00571950 | MICHELL GOODWIN | 1/20/2017 | Not Filed | \$185 | 0 | 03/29/2017 | \$185 | \$185 | 04/17/2017 | \$185 |
| 3275 | NATIONAL CANNABIS INDUSTRY ASSOCIATION PAC | | C00528026 | MICHAEL J. CORREIA | 02/16/2017 | Not Filed | \$24,000 | 0 | 03/29/2017 | \$654 | \$654 | 04/17/2017 | \$654 |
| 3276 | NATIONAL RIGHT TO LIFE POLITICAL ACTION COMMITTEE | | C00111278 | WAYNE COCKFIELD | 12/16/2016 | 8 | \$355,478 | 0 | 03/29/2017 | \$4,995 | \$4,995 | 05/02/2017 | \$4,995 |
| 3277 | NATIONAL RIGHT TO LIFE VICTORY FUND | | C00509893 | WAYNE COCKFIELD | 12/20/2016 | 12 | \$512,811 | 0 | 03/29/2017 | \$6,797 | \$6,797 | 05/02/2017 | \$6,797 |
| 3278 | PENINSULA DEMOCRATIC COALITION | | C00427203 | ZACHERY ROSS | 1/13/2017 | Not Filed | \$2,019 | 0 | 03/29/2017 | \$326 | \$326 | 05/05/2017 | \$326 |
| 3280 | RIGHTS & DEMOCRACY PROJECT | | C00826697 | MARIA FITZSIMMONS | 02/22/2017 | Not Filed | \$97,032 | 0 | 03/29/2017 | \$4,862 | \$4,862 | 05/08/2017 | \$4,862 |
| 3281 | RUN RAY RUN | | C00574806 | GIANNI DONATES | 1/15/2017 | Not Filed | \$42,836 (est) | 0 | 03/29/2017 | \$1,176 | \$1,176 | 06/05/2017 | \$1,176 |
| 3282 | RUSS VICTORY FUND | | C00586180 | JOHN W. MILLER | 1/4/2017 | 27 | \$1,481,744 | 0 | 03/29/2017 | \$14,425 | \$14,425 | 04/28/2017 | \$14,425 |

* This committee disclosed a level of activity after the RTB finding which would result in a lowered civil money penalty and will be assessed a civil money penalty at Final Determination (FD) that has been reduced since the RTB finding. This committee paid the civil money penalty assessed at RTB; therefore, we will issue a refund for the difference.

Federal Election Commission
FD Circulation Report Fine Not Paid
2016 POST-GENERAL Not Election Sensitive 12/08/2016 UNAUTH

| AF# | Committee Name | Candidate Name | Committee ID | Treasurer | Receipt Date | Days Late | LOA | PV | RTB Date | RTB Penalty | Days Since RTB | FD Penalty |
|------|---|----------------|--------------|---------------------|--------------|-----------|----------------|----|------------|-------------|----------------|------------|
| 3253 | AMERICA COMES FIRST PAC | | C00623256 | DAVID W. SCHAMENS | 12/14/2016 | 6 | \$5,491 | 0 | 03/29/2017 | \$101 | 89 | \$101 |
| 3257 | CITIZENS SUPER PAC FOR AMERICA (CSPAC) | | C00496927 | SIDDIQ MUMIN | | Not Filed | \$0 | 1 | 03/29/2017 | \$1,470 | 89 | NONE |
| 3262 | FLORIDIANS FOR A GOOD ECONOMY | | C00606634 | ERIC W. ROBINSON | 1/30/2017 | Not Filed | \$2,380 | 0 | 03/29/2017 | \$326 | 89 | \$326 |
| 3263 | FRESNO COUNTY DEMOCRATIC WOMEN'S CLUB/DEMOCRATS IN ACTION | | C00404350 | SHARLYN WOODY | 6/26/2017 | Not Filed | \$19,429 | 0 | 03/29/2017 | \$654 | 89 | \$654 |
| 3265 | GET OUR JOBS BACK, INC | | C00616078 | STEVEN HOFFENBERG | | Not Filed | \$0 | 0 | 03/29/2017 | \$16,671 | 89 | NONE |
| 3267 | GREAT LAKES SUPER POLITICAL ACTION COMMITTEE | | C00624363 | DWIGHT WASHINGTON | | Not Filed | \$0 | 0 | 03/29/2017 | \$1,176 | 89 | NONE |
| 3279 | PHYLLIS SCHLAFLY EAGLE FORUM PAC | | C00103937 | JOHN SCHLAFLY | 1/25/2017 | Not Filed | \$2,197 | 0 | 03/29/2017 | \$326 | 89 | \$326 |
| 3283 | SWING STATES FOR A CONSERVATIVE WHITE HOUSE PAC INC | | C00362632 | OFFICE OF TREASURER | | Not Filed | \$44,816 (est) | 0 | 03/29/2017 | \$1,176 | 89 | \$1,176 |
| 3284 | THE DEMOCRATIC COALITION | | C00612846 | FRANCESCA N. LUCIA | 1/18/2017 | Not Filed | \$59,195 | 0 | 03/29/2017 | \$654 | 89 | \$654 |
| 3285 | TURKISH AMERICAN HERITAGE POLITICAL ACTION COMMITTEE - TURKISHPAC | | C00454140 | TEKIN KUNT | 12/20/2016 | 12 | \$16,910 | 0 | 03/29/2017 | \$211 | 89 | \$211 |

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) AF 3283
Withdrawal and Resubmission of Final)
Determination Recommendation - 2016)
30 Day Post-General Report)
(Unauthorized Committees) for the)
Administrative Fine Program: Swing)
States For A Conservative White House)
PAC Inc. and Office of Treasurer)

CERTIFICATION

I, Dayna C. Brown, Secretary and Clerk of the Federal Election

Commission, do hereby certify that on July 06, 2017, the Commission decided
by a vote of 5-0 to take the following actions in AF 3283:

1. Make a final determination that Swing States For A Conservative White House PAC Inc. and Office of Treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty in the amount of \$1,176.
2. Send the appropriate letter.

Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

July 6, 2017
Date

Dayna C. Brown
Dayna C. Brown
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 7, 2017

Office of Treasurer, in official capacity as Treasurer
Swing States for a Conservative White House PAC Inc.
717 Whitehills Drive
East Lansing, MI 48823

C00362632
AF#: 3283

Dear Office of Treasurer:

On March 29, 2017, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Swing States for a Conservative White House PAC Inc. and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) for filing late or failing to file the 2016 Post-General Report. By letter dated March 31, 2017, the Commission notified you of the RTB finding and the civil money penalty calculated at the RTB stage to be \$1,176 in accordance with the schedule of penalties at 11 CFR § 111.43. Within forty (40) days of the FEC's RTB finding, you, as treasurer, were required to either transmit payment of the calculated civil money penalty or submit a written response challenging either the RTB finding or the calculated civil money penalty. You must also file the 2016 Post-General Report if you have not already done so.

The FEC did not receive payment of the calculated civil money penalty or a written response within the time permitted. The FEC made a final determination on July 6, 2017 that Swing States for a Conservative White House PAC Inc. and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assessed a civil money penalty in the amount of \$1,176 in accordance with 11 CFR § 111.43. The civil money penalty is based on these factors:

Election Sensitivity of Report: Not Election Sensitive
Level of Activity: \$44,816
Number of Days Late: Not Filed
Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

1. If You Choose to Appeal the Final Determination and/or Civil Money Penalty

If you choose to appeal the final determination, you should submit a written petition, within thirty (30) days of receipt of this letter, to the U.S. District Court for the district in which the committee or you reside, or transact business, requesting that the final determination be

modified or set aside. See 52 U.S.C. § 30109(a)(4)(C)(iii). Your failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver of the respondents' right to present such argument in a petition to the district court under 52 U.S.C. § 30109. 11 CFR § 111.38.

2. If You Choose Not to Pay the Civil Money Penalty and Not to Appeal

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA") as amended by the Debt Collection Improvement Act of 1996 ("DCIA"), 31 U.S.C. § 3701 *et seq.* If you do not pay this debt within thirty (30) days (or file a written petition to a federal district court - see below), the Commission will transfer the debt to the U.S. Department of the Treasury ("Treasury") for collection. Within five (5) days of the transfer to Treasury, Treasury will contact you to request payment. Treasury currently charges a fee of 28% of the civil money penalty amount for its collection services. The fee will be added to the amount of the civil money penalty that you owe. Should Treasury's attempts fail, Treasury will refer the debt to a private collection agency ("PCA"). If the debt remains unpaid, Treasury may recommend that the Commission refer the matter to the Department of Justice for litigation.

Actions which may be taken to enforce recovery of a delinquent debt by Treasury may also include: (1) offset of any payments, which the debtor is due, including tax refunds and salary; (2) referral of the debt to agency counsel for litigation; (3) reporting of the debt to a credit bureau; (4) administrative wage garnishment; and (5) reporting of the debt, if discharged, to the IRS as potential taxable income. In addition, under the provisions of DCIA and other statutes applicable to the FEC, the debtor may be subject to the assessment of other statutory interest, penalties, and administrative costs.

In accordance with the DCIA, at your request, the agency will offer you the opportunity to inspect and copy records relating to the debt, the opportunity for a review of the debt, and the opportunity to enter into a written repayment agreement.

3. If You Choose to Pay the Civil Money Penalty

If you should decide to pay the civil money penalty, follow the payment instructions on page 4 of this letter. You should make payment within thirty (30) days of receipt of this letter.

NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS

4. Partial Payments

If you make a payment in an amount less than the civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assessed upon making a final determination.

5. Settlement Offers

Any offer to settle or compromise a debt owed to the Commission, including a payment in an amount less than the civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted

payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assessed upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

The confidentiality provisions at 52 U.S.C. § 30109(a)(12) no longer apply and this matter is now public. Pursuant to 11 CFR §§ 111.42(b) and 111.20(c), the file will be placed on the public record within thirty (30) days from the date of this notification.

If you have any questions regarding the payment of the civil money penalty, please contact Aimee Wechsler at Federal Election Commission, 999 E St., NW, Washington, DC 20463, or our toll free number (800) 424-9530 (at the prompt, press 5) or (202) 694-1130.

On behalf of the Commission,

A handwritten signature in cursive script, appearing to read "Steven T. Walther".

Steven T. Walther
Chair

ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 CFR § 111.43, the civil money penalty is \$1,176 for the 2016 Post-General Report. The payment is due within 30 days of receipt of this letter.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit www.fec.gov/af/pay.shtml to be directed to Pay.gov's Administrative Fine Program Payment form.

This penalty may also be paid by check or money order made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission
PO Box 979058
St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please send to:

U.S. Bank - Government Lockbox
FEC #979058
1005 Convention Plaza
Attn: Government Lockbox, SL-MO-C2GL
St. Louis, MO 63101

PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTs). Your account will be electronically debited for the amount on the check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: Swing States for a Conservative White House PAC Inc.

FEC ID#: C00362632

AF#: 3283

PAYMENT AMOUNT DUE: \$1,176

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 3283

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